

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UMG RECORDINGS, INC, CAPITOL
RECORDS, LLC, CONCORD BICYCLE
ASSETS, LLC, CMGI RECORDED MUSIC
ASSETS LLC, SONY MUSIC
ENTERTAINMENT, and ARISTA MUSIC

Plaintiffs,

v.

INTERNET ARCHIVE, BREWSTER
KAHLE, KAHLE/AUSTIN FOUNDATION,
GEORGE BLOOD, and GEORGE BLOOD,
L.P.

Defendant.

Civil Action No. 23-cv-7133

**DECLARATION OF WADE LEAK IN SUPPORT OF PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO TRANSFER VENUE**

I, Wade Leak, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am Executive Vice President and Deputy General Counsel at Sony Music Entertainment. In my capacity as in-house counsel for Sony Music Entertainment, among other things, I manage and supervise litigation for Plaintiffs Sony Music Entertainment ("SME") and Arista Music ("Arista Music").


2. I submit this declaration in support of Plaintiffs' Opposition to Defendants' Motion to Transfer Venue. I have knowledge of the facts stated herein based on personal knowledge and my review of the documents and other items referenced herein. If called upon to do so, I am able to testify competently to the matters set forth below.

3. SME and its subsidiary Arista Music are located at 25 Madison Avenue, New York, New York 10010, which is their headquarters and principal place of business, and where their main operations are located, business and legal decisions are made, corporate strategy is developed, and key administrative functions are carried out.

4. The representatives of SME and Arista Music identified as witnesses in Plaintiffs' Initial Disclosures are located as follows:

- a. I, Wade Leak, am employed at SME's offices in New York, New York and reside in the New York metropolitan area;
- b. Tom Tierney is employed at SME's offices in New York, New York and resides in the New York metropolitan area;
- c. Colleen O'Connell is employed at SME's offices in New York, New York and resides in the New York metropolitan area;
- d. Jessica Shaw is employed at SME's offices in New York, New York and resides in the New York metropolitan area.

I declare under penalty of perjury that the foregoing is true and correct.



WADE LEAK

Executed on this 10th day of November 2023.